

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

**KARINA GARCIA, MARIA MATA,
CHLOE BROOKS, ANITA TREVINO,
KARLENE CARPENTER, TANISHA
WILLIAMS, SAMUEL TORRES,
MARLENE BURCH, and ROZEPHYR
JEAN,**

Plaintiffs,

v.

**WILLIS STEIN & PARTNERS, L.L.C.,
MONROE CAPITAL, LLC,
EDUCATION CORPORATION OF
AMERICA, VIRGINIA COLLEGE, LLC,
BRIGHTWOOD COLLEGE,
BRIGHTWOOD CAREER INSTITUTE,
VIRGINIA COLLEGE, ECOTECH
INSTITUTE, STUART C. REED, AVY
HOWARD STEIN, THEODORE
KOENIG, JACKIE BAUMANN, and
ERIN SHEA,**

Defendants.

CIVIL ACTION NO.:

1:18-CV-00621

UNOPPOSED MOTION TO EXCEED PAGE LIMITATIONS

Plaintiffs and Defendants Education Corporation of America, Virginia College, LLC, and Stuart C. Reed (collectively, the “Parties”) file this unopposed motion to exceed page limitations for briefing, as follows:

1. On February 8, 2019, Plaintiffs filed an amended class-action complaint. (D.E. 5.)
2. On February 15, 2019, Defendants Education Corporation of America, Virginia College, LCC, and Stuart C. Reed filed their Motion to Compel Arbitration and to Strike Plaintiffs’ Class Action Claims. (D.E. 7.)

3. The Parties agreed, and the Court granted, an extension of time for Plaintiffs to file their response. (D.E. 9, 10.) Plaintiffs filed their 30-page Response on March 7, 2019. (D.E. 12.)

4. Given the number of Plaintiffs, the number of arguments made by Plaintiffs in their Response, and the law of four different states at issue, the Parties respectfully request ten (10) additional pages for Defendants' Reply, making their reply brief 20 pages, and ten (10) additional pages for Plaintiffs' Sur-Reply making their sur-reply 20 pages.

As outlined herein, the Parties respectfully request this Court extend the page limitations for both Defendants' Reply Brief and Plaintiffs' Sur-Reply by ten (10) pages.

/s/ Ollie A. "Tres" Cleveland, III

Scott S. Brown

(admitted in E.D. Texas)

Ollie A. "Tres" Cleveland, III *(admitted PHV)*

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Attorneys for Defendants

Education Corporation of America, Virginia

College, LLC, and Stuart C. Reed

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, this the 12th day of March, 2019.

/s/ Ollie A. "Tres" Cleveland, III

Ollie A. Cleveland, III